REMARKS:

Status

After this response, claims 31 to 50 and 53 to 58 are pending. Claims 31, 34, 35, and 39 to 43 have been amended, claims 51 to 53 have been cancelled, and claims 57 and 58 have been added. Claims 31, 40, 43 and 54 are the independent claims. Reconsideration and further examination are respectfully requested.

Double Patenting

Claims 31 to 45 and 47 to 56 were rejected under the judicially created doctrine of obviousness-type double patenting over claims 1 to 15, 27 and 28 of U.S. Patent No. 6,457,130. In response, Applicants are filing herewith a terminal disclaimer over 6,457,130. Withdrawal of the double patenting rejection is therefore requested.

Section 102 Rejections

Claims 31 to 56 were rejected under 35 U.S.C. § 102(e) as allegedly anticipated by U.S. Patent No. 6,144,969 (Inokuchi). The rejections of the claims are discussed below, grouped by the independent claims.

Claims 31 to 39 and 57: Amended claim 31 is reproduced below.

31. A method of operating a file server, said method including steps of:

identifying a file on said file server with a first security style selected from among a plurality of security styles corresponding to a plurality of operating systems implemented on said file server; and

enforcing said first security style for all accesses to said file including accesses in another one of said plurality of security styles.

The applied Inokuchi reference is not seen by Applicants to disclose or to suggest the foregoing features of claim 31, at least with respect to "enforcing said first security style for all accesses to said file including accesses in another one of said plurality of security styles."

In more detail, Inokuchi is concerned with file name conversion across operating systems. See, e.g., Inokuchi's Abstract. Inokuchi appears to Applicants to be totally unconcerned with security styles among different operating system.

In the rejection of claims 43 and 46, the Office Action cited column 32, lines 31 to 45, of Inokuchi for teaching "wherein said file server enforces said associated security style for all accesses to said file." This portion of Inokuchi does discuss that "a file name can be readily created for [a] file and the file [can] be accessed by other operating systems." Inokuchi, col. 32, lines 39 to 41. However, Applicants see no discussion of enforcing a particular security style (e.g., a way of handling file access permissions or the like) for those accesses. For example, no discussion is presented of how read and write permissions are handled across the operating systems.

Applicants' representative has carefully reviewed the rest of Inokuchi and sees no discussion therein of such enforcement. Without a discussion of such enforcement, Applicants submit that Inokuchi cannot teach claim 31's feature of "enforcing said first security style for all accesses to said file including accesses in another one of said plurality of security styles."

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For at least the foregoing reasons, reconsideration and withdrawal are respectfully requested of the § 102 rejection of claim 31 and its dependent claims, as is allowance of those claims.

Applicants further note that new dependent claim 57 recites examples of mechanisms for enforcing security style across operating systems. These include "translating a user identification associated with said accesses to said first security style" and "translating access control limits for said file to a second security style associated with said accesses." Applicants do not see anything along these lines in Inokuchi. Claim 57 is therefore believed to be allowable for this additional reason as well. (Of course, independent claim 51 is not limited to the examples recited by claim 57.)

Claims 40 to 42: Amended claim 40 is reproduced below:

> 40. A method of operating a file server, said method including steps of
> identifying a file on said file server with a first security style selected from among a plurality of security styles corresponding to a plurality of operating systems implemented on said file server;
> enforcing said first security style for all accesses to said file server including accesses in another one of said plurality of security styles; and
> identifying said file with a second security style selected from among the plurality of security styles in response to a file server request.

The applied Inokuchi reference is not seen by Applicants to disclose or to suggest the foregoing features of claim 40, at least with respect to "enforcing said first security style for all accesses to said file server including accesses in another one of said plurality of security styles."

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Furthermore, Inokuchi is not seen to disclose or to suggest "identifying said file with a second security style selected from among the plurality of security styles in response to a file server request." Applicants submit that disclosure of such a step would require, at a minimum, some discussion of different security styles (e.g., different ways of handling file access permissions and the like). Inokuchi appears to Applicants be totally silent as to such.

For at least the foregoing reasons, reconsideration and withdrawal are respectfully requested of the § 102 rejection of claim 40 and its dependent claims, as is allowance of those claims.

Claims 43 to 50 and 58: Amended claim 43 is reproduced below.

43. A file server including:
a set of files available on said file server, each said file having an associated security style selected from among a plurality of security styles corresponding to a plurality of operating systems implemented on said file server;
wherein said file server enforces said associated security style for all accesses to said file including accesses in another one of said plurality of security styles.

The applied Inokuchi reference is not seen by Applicants to disclose or to suggest the foregoing features of claim 43, at least with respect to "said file server enforc[ing] said associated security style for all accesses to said file including accesses in another one of said plurality of security styles." Accordingly, reconsideration and withdrawal are respectfully requested of the § 102 rejection of claim 43 and its dependent claims, as is allowance of those claims.

Applicants further note that new claim 58 recites examples of mechanisms for enforcing security style across operating systems, which also do not appear to be taught by Inokuchi. Claim 58 is therefore believed to be allowable for this additional reason as well.

Claims 51 to 53: These claims have been cancelled, rendering their rejection moot.

Claims 54 to 56: Claim 54 is reproduced below.

> 54. In a file server having a plurality of files and a security style associated with each file, said security style being selected from among a plurality of security styles corresponding to a plurality of operating systems implemented on said file server, a data structure associating a security subset of said plurality of security styles with a subtree of said files available on said file server.

The applied Inokuchi reference is not seen by Applicants to disclose or to suggest the foregoing features of claim 54, at least with respect to "a data structure associating a security subset of said plurality of security styles with a subtree of said files available on said file server."

In this regard, the Office Action cited col. 6, lines 1 to 49, of Inokuchi as teaching this feature. In the rejection, the Office Action indicated that this part of "Inokuchi et al disclose a subtree of files (i.e. B-tree) in said file system associated with a security subset of said plurality of security styles." The B*tree in Inokuchi, however, is not a subtree or tree of files. Rather, the B*tree "has a tree structure which is constituted by an index node K as an intermediate node (branch) and leaf nodes E, F and G which actually contain the *extent (EXTx) showing correspondence between the logical address and the physical address.*" Inokuchi, col. 6, lines 50

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to 55 (emphasis added). Applicants see no indication whatsoever that this tree or a subtree thereof is in any way associated with security styles.
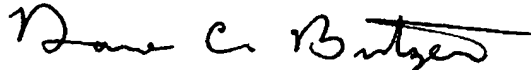
For at least the foregoing reasons, reconsideration and withdrawal are respectfully requested of the § 102 rejection of claim 54 and its dependent claims, as is allowance of those claims.

Closing

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney can be reached at (614) 486-3585. All correspondence should continue to be directed to the address indicated below.

Respectfully submitted,

Dated: February 28, 2004

Dane C. Butzer
Reg. No. 43,521

Swernofsky Law Group PC
P.O. Box 390013
Mountain View, CA 94039-0013
(650) 947-0700